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**2011 Edition**

# Names and Name Changes in Connecticut

A Guide to Resources in the Law Library

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**Treated Elsewhere:** [Assumed or Fictitious Names in Connecticut](#) (Research Guide)

See Also: [Connecticut Law about Name Changes](#)

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only a beginning to research.**

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and to case law hosted on Google Scholar. The online versions are for informational  
purposes only.**

# Section 1: Names and Name Changes in Connecticut (Adult)

*A Guide to Resources in the Law Library*

- SCOPE:** Bibliographic resources relating to the names and change of names of an adult which is effected with or without court proceedings in Connecticut. Includes the right of a married woman to use maiden surname.
- SEE ALSO:**
- [Section 3: Married Woman's Name in Connecticut](#)
- DEFINITIONS:**
- “So far as the statute is concerned, the only jurisdictional requirement is that the complainant be a resident of the county. Nothing is said about the complainant's being domiciled either in the county or in the state. A resident of a place is one who is an actual stated dweller in that place, as distinguished from a transient dweller there, and he may have a technical domicile elsewhere.” *Don v. Don*, 142 Conn. 309, 311, 114 A.2d 203 (1955).
- STATUTES:**
- CONN. GEN. STAT. (2011)
    - § [45a-99](#). Jurisdiction to grant change of name. Exceptions. Requirements re persons required to register with Commissioner of Public Safety as a sexual offender. Commissioner's standing to challenge change of name.
    - § [45a-736](#). Change of name of adopted person.
    - § [45a-737](#). [adopted person] Obliteration of original name on institutional records, new name substituted.
    - § [46b-1](#). Family relations matters defined.
    - § [46b-63](#). Restoration of birth name or former name of spouse
    - § [52-11](#). Complaints for change of name. Exceptions re persons required to register with Commissioner of Public Safety as a sexual offender. Commissioner's standing to challenge change of name.
- LEGISLATIVE:**
- [2008 CONN. ACTS 54](#) (Reg. Sess.). An act concerning sexual offender name changes.
  - [1991 CONN. ACTS 10](#) (Reg. Sess.). An act concerning jurisdiction to grant change of name. “To permit courts of probate to grant a change of name after the superior court has entered its final decree in a dissolution matter.”
- OLR Report**
- John Kasprak, *Birth Certificate Alteration*, CONNECTICUT GENERAL ASSEMBLY. OFFICE OF LEGISLATIVE RESEARCH Report No. [1996-R-0344](#) (February 21, 1996).  
“You want to know if a person born in the 1960s can have his birth certificate altered so that it no longer indicates a sex change and name change.”
- CASES:**
- [In Re Michaela Lee R.](#), 253 Conn. 570, 589-90, 756 A.2d 214 (2000). “Section 45a-99 [Conn. Gen. Stats.] provides probate courts with jurisdiction to act upon an application for a change of name, but does not provide any authority for probate courts to amend the applicant's birth certificate to reflect the new name. Rather, the department [of public health], pursuant to the express language of § 19a-42 (d), amends the birth certificate upon receipt of a change of name order from a Probate Court and upon request of the applicant.”
  - [Mayor v. Mayor](#), 17 Conn. App. 627, 631, 554 A.2d 1109 (1989). “We will not assume that the statutory language granting the court jurisdiction of ‘complaints praying for a change of name’ is meaningless or superfluous. (Emphasis added) . . . It

is apparent from the clear words of 52-11 and 46b-1 (6) that the legislature contemplated that a court should effect a change of name only in the context of an action brought for that purpose by the person desiring the change of name.”

- In Re Bruce A. Brast, 32 Conn. Supp. 1, 334 A.2d 483 (1974). “Whether a change of name should be granted is a matter which rests within the sound discretion of the court . . . . Some substantial reason must, however, exist before the court is justified in denying a petition for a change of name. The court is not subject to the whims of every petitioner for a change of name . . . . Although an individual may change his name at his pleasure, the court will not effect a change of name as a matter of course . . . . A petitioner for a change in name has the burden of proof.”
- Don v. Don, 142 Conn. 309, 312, 114 A.2d 203 (1955).
- Lewis v. Scoville, 94 Conn. 79, 85-86, 108 A. 501 (1919). “In this case the plaintiff by his writ told the whole story: that he did business under the business name of the Army and Navy Magazine. The complaint properly counted on the business name only as the name disclosed to the defendant.”

**WEST KEY  
NUMBERS:**

- *Names*
  - #1. Requisites and sufficiency
  - #5. \_\_\_\_\_. Abbreviations
  - #6. \_\_\_\_\_. Initials
  - #9. Mode of conferring or acquiring. In general
  - #10. \_\_\_\_\_. Assumed names
  - # 20. Change

**ENCYCLOPEDIAS**

- 57 AM. JUR. 2d *Name* (2001)
  - I. In general
  - II. Change of name
  - III. Idem sonans
  - IV. Fictitious or assumed name
- 65 C.J.S. *Names* (2010)
  - I. In General
  - II. Kinds of names and their components
  - III. Assumed or fictitious name
  - IV. Change of name
  - V. Evidence and Procedure
- Robin Miller, Annotation, *Validity of Legal Claim Predicated on Nonmarital Same-Sex Relationship*, 8 ALR6th 339 (2005).
- Jane M. Draper, Annotation, *Circumstances Justifying Grant or Denial of Petition to Change Adult’s Name*, 79 ALR3d 562 (1977).
- Annotation, *Validity and effect of provision in will or trust instrument, conditioning gift on beneficiary’s assumption or retention of family name*, 38 ALR2d 1343 (1954).

**TEXTS &  
TREATISES:**

- RALPH H. FOLSOM AND GAYLE B. WILHELM, PROBATE JURISDICTION AND PROCEDURE IN CONNECTICUT 2D (2010).
  - § 2:30. Probate court jurisdiction over name change

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**Table 1: Statutes Dealing with Name Changes**

Statutes Dealing with Name Changes	
Superior Court	
<a href="#">46b-1(4) and (6)</a>	<b>Family relations matters defined.</b> Matters within the jurisdiction of the Superior Court deemed to be family relations matters shall be matters affecting or involving . . . (4) alimony, support, custody and change of name incident to dissolution of marriage, legal separation and annulment . . . (6) complaints for change of name . . .”
<a href="#">46b-63</a>	<b>Restoration of birth name or former name of spouse.</b> (a) At the time of entering a decree dissolving a marriage, the court, upon request of either spouse, shall restore the birth name or former name of such spouse. (b) At any time after entering a decree dissolving a marriage, the court, upon motion of either spouse, shall modify such judgment and restore the birth name or former name of such spouse.
<a href="#">52-11</a>	<b>Complaints for change of name. Exceptions re persons required to register with Commissioner of Public Safety as a sexual offender. Commissioner's standing to challenge change of name.</b> (a) The superior court in each judicial district shall have jurisdiction of complaints praying for a change of name, brought by any person residing in the judicial district, and may change the name of the complainant, who shall thereafter be known by the name prescribed by said court in its decree. (c) Whenever the court, pursuant to this section, orders a change of name of a person, the clerk of the court shall notify the Commissioner of Public Safety of the issuance of such order if the clerk finds that such person is listed in the registry established and maintained pursuant to section 54-257.
Probate Courts	
<a href="#">45a-99</a>	<b>Jurisdiction to grant change of name. Exceptions. Requirements re persons required to register with Commissioner of Public Safety as a sexual offender. Commissioner's standing to challenge change of name.</b> (a) The courts of probate shall have concurrent jurisdiction with the Superior Court, as provided in section 52-11, to grant a change of name, except a change of name granted in accordance with subsection (a) of section 46b-63. (c) Whenever the court, pursuant to this section, orders a change of name of a person, the court shall notify the Commissioner of Public Safety of the issuance of such order if the court finds that such person is listed in the registry established and maintained pursuant to section 54-257.
<a href="#">45a-736</a>	<b>Change of name of adopted person.</b> Any court of probate, as part of its approval of any agreement of adoption or declaration of an intention to adopt, may change the name of the person adopted, as requested by the adopting parent or parents.
<a href="#">45a-737</a>	<b>Obliteration of original name on institutional records, new name substituted.</b> Upon the request of an adopting parent of a child adopted under the provisions of section 45a-727, any public or quasi-public institution, including but not limited to schools and hospitals, shall obliterate the original family name of an adopted child and substitute the new name of the child on its records; except that the person in charge of the records may apply to the court of probate having jurisdiction over the adoption and show cause why the name shall not be substituted. The court may grant or deny the order for the substitution of names as it deems to be in the best interests of the child.

Table 1 (continued)

Department of Public Health	
<a href="#">19a-42(d)</a>	<p><b>Amendment of vital records.</b> (1) Upon receipt of (A) an acknowledgment of paternity executed in accordance with the provisions of subsection (a) of section 46b-172 by both parents of a child born out of wedlock, or (B) a certified copy of an order of a court of competent jurisdiction establishing the paternity of a child born out of wedlock, the commissioner shall include on or amend, as appropriate, such child's birth certificate to show such paternity if paternity is not already shown on such birth certificate and to change the name of the child if so indicated on the acknowledgment of paternity form or within the certified court order as part of the paternity action.</p> <p>(2) If another father is listed on the birth certificate, the commissioner shall not remove or replace the father's information unless presented with a certified court order that meets the requirements specified in section 7-50, or upon the proper filing of a rescission, in accordance with the provisions of section 46b-172. The commissioner shall thereafter amend such child's birth certificate to remove or change the father's name and to change the name of the child, as requested at the time of the filing of a rescission, in accordance with the provisions of section 46b-172. Birth certificates amended under this subsection shall not be marked "Amended".</p>

Table 2: Idem Sonans

Idem Sonans	
Definition	<p>The rule of idem sonans, where recognized, provides that even given a variance in the spelling of two names, if the correct pronunciation of the two names results in practically identical sounds, the names are held to designate the same person. 1 As stated by another court, idem sonans is the rule of law that a variant spelling of a name in a document will not render the document void if the misspelling is pronounced in the same way as the true spelling, and literally, it means "having the same sound."</p> <p>57 Am Jur 2d § 60</p>
Encyclopedias	<ul style="list-style-type: none"> <li>57 <a href="#">AM. JUR. 2d</a> <i>Name</i> (2001).  III. Idem sonans  § 60. Generally  § 61. Application and illustration of doctrine  § 62. —Prima facie application  § 63. Questions of law and fact; Appeal</li> <li>65 <a href="#">C.J.S.</a> <i>Names</i> (2010)  § 3. Idem sonans</li> </ul>

## Section 2: Children's Surnames

*A Guide to Resources in the Law Library*

### SCOPE:

- Bibliographic sources relating to change of name of a minor

### DEFINITIONS:

- “When the question presented is whether the name of a minor child should be changed, the court, in line with its universal duty to protect the interests of minors, must take into consideration whether the change of name will promote the child's best welfare. In the present case, on the facts found, there was no indication that to change the plaintiff's name would cause any legal injury to anyone. The most that could be said against it was that it might hurt the defendant's sensibilities. It did not, of course, make any change in the relationship of parent and child which existed between them.” Don v. Don, 142 Conn. 309, 312, 114 A.2d 203 (1955).
- **Best Interest of the Child:** "In determining whether the application for change of name should be granted, the court is bound to consider the best interests of the minor child." Peterson v. Peterson, No. CV-99 0337876S (Conn. Super. Ct., Danbury, May 22, 2000), 2000 WL 739636.

### STATUTES:

- CONN. GEN. STAT. (2011)
  - [§ 7-50](#). Restrictions on content of birth certificates. Exceptions. Filing of acknowledgments or adjudications of paternity. Removal or changing of paternity information. Access to copies restricted.
  - [§ 45a-99](#). Jurisdiction to grant change of name. Exceptions. Requirements re persons required to register with Commissioner of Public Safety as a sexual offender. Commissioner's standing to challenge change of name.
  - [§ 45a-736](#). Change of name of adopted person.
  - [§ 45a-737](#). [adopted person] Obliteration of original name on institutional records, new name substituted.
  - [§ 46b-1](#). Family relations matters defined.
  - [§ 46b-63](#). Restoration of birth name or former name of spouse.
  - [§ 52-11](#). Complaints for change of name. Exceptions re persons required to register with Commissioner of Public Safety as a sexual offender. Commissioner's standing to challenge change of name.

### LEGISLATIVE:

- [2003 CONN. ACTS 202](#) § 17-18

### COURT RULES:

- CONNECTICUT PRACTICE BOOK (2011)
  - [§ 9-24](#). Change of name by minor children. “In all proceedings for change of name under General Statutes § 52-11, brought by a minor child through his or her next friend, the parents of such child, not named as next friends, shall be necessary parties and shall be cited in, in such manner as shall be ordered by the court or a judge thereof.”

### FORMS:

- Probate Court
  - [Form PC-900. Application for Change of Name \(Minor\)](#).
- 2 [CONNECTICUT PRACTICE BOOK](#) Form 504.3. Application for change of name
- 18A AM JUR PLEADING & PRACTICE FORMS, *Name* Forms 31-44  
Changing minor's name

### CASES:

- [Okeke v. Commissioner of Public Health](#), 122 Conn.App. 373, 999 A. 2d 808 (2010), cert. granted, 298 Conn. 915, 4 A.3d 832 (2010). “The plaintiff contends that the

phrase 'to change the name of the child if so indicated on the acknowledgement of paternity form' essentially directs the commissioner to ensure that the name on the birth certificate corresponds to the name on the acknowledgement of paternity form. When read in its entirety, however, we conclude that the plaintiff's contention is misplaced because the plaintiff ignores the triggering language that allows the commissioner to amend a birth certificate pursuant to § 19a-42(d)(1): '*if paternity is not already shown on such birth certificate....*' (Emphasis added.) General Statutes § 19a-42(d)(1). The unambiguous language of the statute involves determinations of paternity and changing a child's name when it is determined that the biological father of the child is not listed, or is incorrectly listed, on the birth certificate. Here, paternity is already shown on the birth certificate and there has never been a question regarding the identity of the biological father."

- St. Amour v. Carvalho, No. FA04 4000030 (Conn. Super. Ct., Aug. 11, 2005), 39 Conn. L. Rptr. 677. "There is no statutory provision or case law which prescribes the establishment of a child's surname. The case of *Shockley v. Okeke*, 48 Conn.Sup. 647, 856 A.2d 1054 (2004) (37 Conn. L. Rptr. 593), is most instructive on the lack of a naming procedure."
- Mejias v. Sebastian, No. FA98-0116648 (Dec. 1, 2004) "The child's name is not required to be placed on the birth certificate. General Statutes § 7-50. The state regulations concerning birth certificates are silent on confirming the child's name. Even when the mother and father are the statutory birth reporters, certain detailed information must be provided, but the child's name is not required. Regs., Conn. State Agencies § 19a-14-1."
- Shockley v. Okeke, 48 Conn. Sup. 647, 664 (2004). "The court finds that the legal name of the minor child is as acknowledged by both the parents of the child in the acknowledgment of paternity that is on file both in the present case and in the companion custody and visitation case."
- Peterson v. Peterson, No. CV-99 0337876S (Conn. Super. Ct., Danbury, May 22, 2000), 2000 WL 739636. "In applying the fair preponderance of the evidence test, this court finds that the change of name for the minor child from the last name of Peterson to the last name of Silva, is in the best interest of the minor child. This court further finds that the new name of the minor child will not result in injury to some other person with respect to such person's legal rights. This court therefore orders that the respondent immediately take steps to obtain a new (not corrected) birth certificate . . . ."
- In Re Michaela Lee R., 253 Conn. 570, 592, 756 A.2d 214 (2000). "Probate courts are not required to remove parental information from birth certificates under any provision of the General Statute."
- Delaney v. Appeal from Probate, 9 Conn. L. Rep. 571 (Conn. Super. Ct. 1993). "This court determines that it is in the best interest of the child that the child have the last name Brown . . . . The court further determines that for sound reason the name Delaney should also be included in the child's name. In this fashion the bond between father and son can be preserved and enhanced, and the relationship between the changed name and the birth name will appear of record to obviate any confusion when the child, in later life, is required to produce documentation of name at birth."
- Don v. Don, 142 Conn. 309, 312, 114 A2d 203 (1955). "When the question presented is whether the name of a minor child should be changed, the court, in line with its universal duty to protect the interests of minors, must take into consideration whether the change of name will promote the child's best welfare. In the present case, on the facts found, there was no indication that to change the plaintiff's name would cause any legal injury to anyone. The most that could be said against it was that it might hurt the defendant's sensibilities. It did not, of course, make any change in the relationship of parent and child which existed between them."
- Mayor v. Mayor, 17 Conn. App. 627, 629, 554 A.2d 1109 (1989). "The question for

our consideration is whether, in the context of an action for dissolution of marriage, the trial court had jurisdiction to change the name of the parties' minor child upon the request of one of the parties."

"On the basis of the express terms of §§ 52-11 and 46b-1(6), we conclude that the trial court was without jurisdiction to change the name of a nonparty minor child incident to the dissolution of the parents' marriage." Ibid., 632.

- Cynthia S. v. Rosario G., 5 CONN. L. RPTR. 234 (1991). "Defendant's request to change the child's last name to his is not acted upon, the court determined it is without jurisdiction to entertain this request in this proceeding. Such a request must be brought in a separate proceeding to which the child is a party by a person authorized to do so."

#### **DIGESTS:**

- CONNECTICUT FAMILY LAW CITATIONS: *NAME CHANGE*

#### **ENCYCLOPEDIAS:**

- 57 AM. JUR. 2d *Name* (2001).  
I. In general  
§§ 12-15. Minor's name  
II. Change of name  
§§ 43-59. Minor's name  
§§ 43-46. In general  
§§ 47-55. Particular factors considered  
§ 56-59. Proceedings
- 65 C.J.S *Names* (2010)  
IV. Change of name  
§ 23. Minor child  
§ 24. Minor child—Best interest of child  
§ 25. Minor child—Change sought by minor
- Jay M. Zitter, Annotation, *Rights and Remedies of Parents Inter Se With Respect To The Names Of Their Children*, 40 ALR5th 697 (1996).
- Annotation, *Change Of Child's Name In Adoption Proceeding*, 53 ALR2d 927 (1957).
- Annotation, *Validity And Enforceability Of Contract In Consideration Of Naming Child*, 21 ALR2d 1061(1952).

#### **LAW REVIEWS:**

- Richard J. Lussier, Case Note, *Delaney v. Appeal from Probate: When Is A Dual Surname In The Best Interest Of The Child?*, 9 CONNECTICUT PROBATE LAW JOURNAL 161-170 (Fall 1994).

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**Table 3: Shockley v. Okeke, 48 Conn. Sup. 647 (2004)**

<p style="text-align: center;"><a href="#"><u>Shockley v. Okeke</u></a>, 48 Conn. Sup. 647, 856 A. 2d 1054 (2004)</p> <p style="text-align: center;">(Judgment affirmed in part, reversed in part by <a href="#"><u>Shockley v. Okeke</u></a>, 92 Conn. App. 76, 882 A.2d 1244 (2005))</p>	
Rule for change of name of a minor child	<p>“This court finds that there is a single rule for change of a minor child's name and that rule applies to all applications for change of a minor child's name regardless under which statute such a claim is brought. <i>Mayor v. Mayor</i>, 17 Conn. App. 627, 629, 633, 554 A.2d 1109 (1989).</p> <p>The following is the single rule for change of name of a minor child under any of the three aforementioned statutes [ §§ 52-11, 46b-1(6) and 45a-99]. ‘Whether an application for a change of name should be granted is a matter which rests in the sound discretion of the court. . . . In exercising that discretion, the court should bear in mind that, generally speaking, independently of any court order, a person is free to adopt and use any name he sees fit. . . . Ordinarily, therefore, an application for a change of name should be granted unless it appears that the use of the new name by the applicant will result in injury to some other person with respect to his legal rights, as, for instance, by facilitating unfair competition or fraud. . . . When the question presented is whether the name of a minor child should be changed, the court, in line with its universal duty to protect the interests of minors, must take into consideration whether the change of name will promote the child's best welfare.’ (Citations omitted.) <i>Don v. Don</i>, supra, 142 Conn. 311-12.” <a href="#"><u>Shockley v. Okeke</u></a>, 48 Conn. Sup. 647, 653-654 (2004)</p>
Burden of Proof	<p>“The plaintiff, as the moving party, has the burden of proof . . . . Courts have rejected the clear and convincing evidence test and applied the fair preponderance of the evidence test in making change of name decisions.” <a href="#"><u>Shockley v. Okeke</u></a>, 48 Conn. Sup. 647, 654 (2004)</p>
Finding	<p>“This court, applying the standards of <i>Don</i> to these claims, finds: (1) The interests of the defendant would be severely prejudiced by the change of name; (2) The plaintiff has failed to identify what the child's legal name is and, therefore, from what legal name the change is sought; (3) The plaintiff has permitted the following spellings of the child's name to occur in the Superior Court record: as to the first name - Nnamdi and Nnambi; as to the second name - Ikwunne, Ikwanne, Ikwane and no middle name; as to the last name - Okeke and Shockley-Okeke; (4) The plaintiff has not produced any proof that the child's last name was ever Shockley-Okeke; and, (5) It is not in the best interests of the child to change his name. <a href="#"><u>Shockley v. Okeke</u></a>, 48 Conn. Sup. 647, 656 (2004).</p>

**Table 4: Restrictions on Contents of Birth Certificate**

<b>Restrictions on content of birth certificates. Exceptions. Filing of acknowledgments or adjudications of paternity. Removal or changing of paternity information. Access to copies restricted.</b>
<p style="text-align: center;"><b>Conn. Gen. Stats. <a href="#">§ 7-50</a> (2011)</b></p>
<p>(a) a) No certificate of birth shall contain any specific statement that the child was born in or out of wedlock or reference to illegitimacy of the child or to the marital status of the mother, except that information on whether the child was born in or out of wedlock and the marital status of the mother shall be recorded on a confidential portion of the certificate pursuant to section 7-48. Upon the completion of an acknowledgment of paternity at a hospital, concurrent with the hospital's electronic transmission of birth data to the department, or at a town in the case of a home birth, concurrent with the registration of the birth data by the town, the acknowledgment shall be filed in the paternity registry maintained by the department, as required by section 19a-42a, and the name of the father of a child born out of wedlock shall be entered in or upon the birth certificate or birth record of such child. All properly completed post birth acknowledgments or certified adjudications of paternity received by the department shall be filed in the paternity registry maintained by the department, and the name of the father of the child born out of wedlock shall be entered in or upon the birth record or certificate of such child by the department, if there is no paternity already recorded on the birth certificate. If another father's information is recorded on the certificate, the original father's information shall not be removed except upon receipt by the department of a certified order by a court of competent jurisdiction in which there is a finding that the individual recorded on the birth certificate, specifically referenced by name, is not the child's father, or a finding that a different individual than the one recorded, specifically referenced by name, is the child's father. The name of the father on a birth certificate or birth record shall otherwise be removed or changed only upon the filing of a rescission in such registry, as provided in section 19a-42a. The Social Security number of the father of a child born out of wedlock may be entered in or upon the birth certificate or birth record of such child if such disclosure is done in accordance with 5 USC 552a note.</p>
<p>(b) The department shall restrict access to and issuance of certified copies of acknowledgments of paternity as provided in section 19a-42a.</p>

## Section 3: Married Woman's Name in Connecticut

*A Guide to Resources in the Law Library*

- SCOPE:** Bibliographic resources relating to the name of a married woman in Connecticut including restoration of birth name or former name upon termination of marriage
- SEE ALSO:**
- [Section 1: Names and Name Changes in Connecticut \(Adult\)](#).
- DEFINITIONS:**
- “The rule that requires a woman to assume her husband’s surname upon marriage made some sense in an age where a married woman could not contract, hold property or sue or be sued except through her husband . . . But such restrictions on the legal rights of married women do not exist today in Connecticut.” Custer v. Bonadies, 30 Conn. Supp. 385, 389, 318 A.2d 639 (1974).
  - “It would appear that the custom of the wife's taking the name of the husband at the time of marriage remained just that, custom, and never became law. It was and is a question of choice and reputation.” Malone v. Sullivan, 124 Ariz. 469, 605 P.2d 447 (1980).
  - “In the case of a married woman, even if she changes her name upon marriage, there is nothing which forbids her from changing it back to her maiden name, as long as she does not do so for criminal or fraudulent purposes.” Brown v. Brown, 384 A.2d 632 (D.C. 1977).
- STATUTES:**
- CONN. GEN. STAT. (2011)
    - [§ 9-20](#). Admission of electors; procedures.
    - [§ 46b-63](#). Restoration of birth name or former name of spouse.
    - [§ 47-12](#). Change in name or status of owner of real estate.
    - [§ 47-13](#). Conveyance of property acquired prior to change of name.
- LEGISLATIVE:**
- 1975 CONN. ACTS 343 § 1 (Reg. Sess.). An act eliminating an unnecessary distinction in the conveyance of property by married woman.
- CONNECTICUT ATTORNEY GENERAL:**
- 22 OP. ATTY. GEN. 249 (October 17, 1941). “We doubt that there is . . . any mandate in our statutes compelling a married woman to take and adopt the surname of her husband.”
- FORMS:**
- ARNOLD H. RUTKIN ET AL. [CONNECTICUT PRACTICE SERIES. FAMILY LAW AND PRACTICE WITH FORMS](#) [Vol. 7 CONNECTICUT PRACTICE BOOK ANNOTATED] (2d ed. 1999). Chapter 9. Change of name.
    - § 9.4. Motion to restore former name—form
- CASES:**
- Custer v. Bonadies, 30 Conn. Supp. 385, 390, 318 A.2d 639 (1974). “It is doubtless true that the vast majority of women will continue to follow the social custom of our times and adopt their husband’s surnames. That fact, however, provides no basis for a rule of law which would mandate it despite personal, professional or business reasons which would motivate individual women to do otherwise . . . The court therefore concludes that the common-law right of a person to use a name, a right enunciated by our Supreme Court in Don v. Don, 142 Conn. 309, applies to the surname of a married women.”
  - [Don v. Don](#), 142 Conn. 309, 114 A2d 203 (1955).

**WEST KEY  
NUMBERS:**

- *Names*
- *Divorce* #317. Name of wife

**DIGESTS:**

- DOWLING'S CONNECTICUT DIGEST: *NAMES*

**ENCYCLOPEDIAS**

- 57 [AM. JUR. 2d](#) *Name* (2001).
  - I. In general
    - Married woman's name
      - § 9. Surname; right to retain maiden name
      - § 10. – Effect of particular factors
      - § 11. First name
  - II. Change of name
    - Married woman's name
      - § 40. In general
      - § 41. Change incident to dissolution of marriage
      - § 42. – Effect and applicability of dissolution statutes; judicial discretion
- 65 [C.J.S.](#) *Names* (2010)
  - § 6. Surname—Adoption by woman upon marriage
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